
Founded in 1989, Thorlabs, Inc., and each of its domestic and foreign subsidiaries (collectively, “Thorlabs”) has been serving the photonics industry by designing and manufacturing “tools of the trade” and by identifying, enabling and accelerating key photonics technologies. Thorlabs is driven by its customer-centric philosophy and its commitment to achieving and maintain the highest level of business integrity.

Our commitment to the photonics industry, our customers, and the communities within which we operate is more comprehensive than providing reliable service, quality products and a safe working environment. We are committed to conducting our manufacturing and administrative operations in line with the highest standards of business ethics and respect for the environment and human rights.

The suppliers and service providers that we work with are an integral part of our ability to deliver on this commitment. Accordingly, Thorlabs will only do business with suppliers and service providers who are willing to comply with local laws and other legal requirements that are applicable to their operation and to our ability to deliver products internationally. To further the impact of our commitments and to ensure that our goals align with that of our suppliers, we encourage all of our vendors to maintain the same standards as laid out in this document. To solidify this commitment, we have created this Code of Conduct that we pledge to follow and expect our suppliers to adopt.

This Code of Conduct has been approved by Thorlabs’ Board of Directors, and sets the standards for our business to promote responsible decision-making through compliance with laws and regulations regarding respect for people, health and safety, ethical business practices, and environmental responsibility, and by exceeding basic compliance when and where feasible. These laws and regulations include, among others, compliance with the United Nations Universal Declaration of Human Rights, the Minimum Age Convention 138 and Worst Forms of Child Labour Convention of 182 of the International Labour Organization (“ILO”), the ILO Declaration of Fundamental Principles and Rights at Work adopted by the International Labour Conference on June 18, 1998, the U.K. Modern Slavery Act, the U.S. Foreign Corrupt Practices Act, the U.K Bribery Act and the German Anti-Bribery laws.

Respect for People

Thorlabs recognizes that people are a critical component of its operations. By complying with relevant federal, state, provincial and local employment laws and regulations, Thorlabs ensures that the people involved in its operations are treated with respect and fairness.

To that end, Thorlabs and its suppliers will ensure that:

- No forms of illegal, forced, or compulsory labor are tolerated.
- Legally mandated family, child birth and medical leaves, and return to work regulations are followed.

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- No persons below the minimum age required for work are employed by Thorlabs or its suppliers. This includes child labor. (The term “child” refers to an individual who is younger than 15 or the local legal minimum age for employment or the age for completing compulsory education.)
 - Discrimination with respect to age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual preference or identity, political opinion, veteran status, or any other characteristic protected by law is not present in the hiring process or employment practices such as salary, benefits, advancement, discipline, and termination or retirement.
 - Applicable laws and regulations that deal with compensation are followed. At a minimum, all applicable wage and hour laws and regulations, including those related to minimum wages, overtime, maximum hours, piece rates, and other components of compensation are followed and legally mandated benefits are provided. Employees are compensated for overtime hours at a premium rate as is legally required or, if no legally dictated rate exists, at a rate at least equivalent to the regularly hourly compensation rate.
 - Except in extraordinary business situations (and within the terms permitted by law), employees will not be required to work more than the limits on regular and overtime hours permitted by local law. Employees will also be entitled to at least one day off in every seven-day period.
 - Harassment in any form (physical, sexual, psychological, or verbal), abuse, violence, and bullying are not permitted.
 - If local standards are higher than applicable legal requirements, these higher standards are met.

Ethical Business Practices

We support ethical business practices that allow for fair and honest success. As an international company, Thorlabs must comply with the laws of the different countries in which it does business.

In support of fair and ethical business practices, Thorlabs and its supplier ensure the pursuit of:

- Compliance with applicable competition or antitrust laws. To follow antitrust laws, there should be no communication with any competitors regarding price or production levels, division of allocation of markets or customers, agreement with a competitor to boycott another business, or inappropriate conditions put on purchases or sales.
- Compliance with laws and regulations on corruption, bribery, and extortion to prevent companies and individuals from gaining an unfair advantage and from undermining the rule of law. The acceptance or offering of bribes or kickbacks and/or the facilitation of corrupt activities are not allowed.

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- Compliance with laws related to money laundering.
 - Avoidance and, if that is not possible, the disclosure of conflicts of interest in business operations.
 - Compliance with applicable export control laws of the country in which they are present or from which the goods originate.
 - Books and records that are full, fair, accurate, and timely. The production of false records is not supported under any circumstances.
 - Fair dealings with customers and suppliers so that no one receives an unfair advantage through manipulation or misrepresentation of material facts.
 - Confidentiality of information entrusted to employees by the company, its customers, and its vendors and suppliers except when disclosure is authorized or legally mandated. Confidential information includes all non-public information.
 - The reporting of any illegal or unethical behavior that is contrary to the Code of Conduct or law to the appropriate person of authority in a company. There will be no retaliation against anyone who presents this information in good faith.

Environmental Sustainability

Thorlabs recognizes its obligation to minimize the environmental impact that its operations has on the communities within which it operates and the markets into which its products are sold. By reducing our resource consumption, making our operations more efficient, and fostering a culture of sustainability within our company, our customers, and our community, Thorlabs seeks to promote not only a vibrant photonics community, but also healthy ecosystems.

To manage our environmental responsibilities, Thorlabs and its suppliers will:

- Ensure compliance with all applicable environmental laws and regulations.
- Assure that all environmentally sensitive and hazardous materials are identified and managed to ensure their safe handling, movement, storage, recycling, reuse, or disposal.
- Continually monitor, pursue, and evolve environmental sustainability efforts to improve environmental performance where feasible.

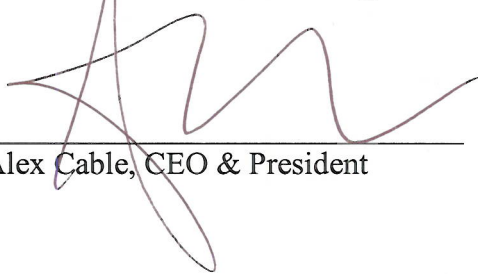
Occupational Health and Safety

Thorlabs is committed to providing a safe and healthy work environment in compliance with all applicable laws and regulations at all its sites for their employees, visitors, and the local community. All employees are expected to observe all safety rules and to follow instructions and protocols concerning safe work practices.

In order to keep safe facilities, Thorlabs and its suppliers will:

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- Maintain facilities that are in compliance with any relevant laws and regulations regarding health and safety.
 - Ensure reasonable access to potable water and sanitary facilities, fire safety, and adequate lighting and ventilation.
 - Create a team to actively identify and evaluate safety risks where feasible. Encourage employees to report accidents and unsafe conditions.
 - Compose a plan to handle and limit safety and health issues to the extent possible.
 - Provide training for employees and necessary equipment so employees can perform their jobs safely, especially when an employee's work involves heavy machinery or hazardous substances.
 - Keep required credentials up-to-date.

Approved on behalf of Thorlabs and
each of its domestic and foreign subsidiaries



A handwritten signature in dark ink, appearing to read 'Alex Cable', is written over a horizontal line.

Alex Cable, CEO & President